

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

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D.L.,

Plaintiff,

vs.

KALAMAZOO PUBLIC SCHOOLS,

Defendant.

Case No. 1:22-cv-01208

Hon. Robert J. Jonker

Related Case No. 2:19-cv-22-cv-00838

**Declaration of Kelly Davis in Support of  
Defendant's Motion to Dismiss**

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**DECLARATION**

I, Kelly Davis, declare under penalty of perjury to the following facts:

1. My name is Kelly Davis.
2. I am over the age of 18 years old and am a resident of the Kalamazoo Public Schools District, State of Michigan.
3. I have personal knowledge of the following facts and, if called as a witness in this matter, my testimony would be consistent with the statements set forth in this Declaration.
4. I have been employed by the Kalamazoo Public Schools since 2008, and during that time I have been employed in the Department of Human Resources from 20028 to 2010, 2013 to 2018 and from April, 2022 to present.
5. Since January 9, 2023, my title is Executive Personnel Specialist of the Human Resources Department, and previously my title was Administrative Assistant to the Assistant Superintendent of Human Resources.
6. My direct report or direct supervisor at the Kalamazoo Public Schools is Sheila Dorsey-Smith, who is the Assistant Superintendent for Human Resources for the school district.
7. My workstation is located in the office of the Department of Human Resources which is a separate and district from the Office of Superintendent for the school district.
8. I do not work directly for nor do I report to the Office of Superintendent.
9. I do not work for nor do I report to the President, Secretary, or Treasurer of the Board of Education of the Kalamazoo Public Schools.
10. I am not an elected official of or for the Kalamazoo Public Schools.

11. At no time have I been authorized to accept service of process for or on behalf of the Office of Superintendent or for or on behalf of the President, Secretary and/or Treasurer of the Board of Education.

I declare under penalty of perjury under the laws of the State of Michigan that the foregoing is true and correct, and that this declaration was made and executed on this date, February 6, 2023.

  
Kelly Davis